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The Honorable Raymond J. Dearie  
United States District Judge  
United States Courthouse  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

July 26, 2016

**Re: United States v. Jeffrey Webb, et al., 15 Cr. 252 (RJD)**

Dear Judge Dearie:

We write to respectfully request that the Court modify Mr. Webb's bail conditions to temporarily release Mr. Webb's passport for the limited purpose of facilitating his application for a Georgia state driver's license. All other bail conditions shall remain the same.

The Court previously granted Mr. Webb the privilege of traveling within 50 miles from his home in Loganville, Georgia, during the hours of 8:00 AM to 5:00 PM, seven days a week, for the purpose of running errands and to facilitate care of his infant son. The use of a car is essential for this purpose, and Mr. Webb must present his original passport to the Georgia Department of Driver Services before he can apply for a driver's license in Georgia. Currently, Mr. Webb only has a driver's license issued by the Cayman Islands.

For the limited purpose of allowing Mr. Webb to obtain a Georgia driver's license, the government has agreed that the FBI will release Mr. Webb's passport directly to Mr. Jeffrey H. Brickman, an attorney based in Atlanta, Georgia. Mr. Brickman has previously assisted us in our representation of Mr. Webb, and he has kindly agreed to retain custody of Mr. Webb's passport while he accompanies Mr. Webb to the Georgia Department of Driver Services. Once Mr. Webb has submitted his application for a driver's license to the Georgia Department of Driver Services, Mr. Brickman will return Mr. Webb's passport to the FBI.

We have consulted with Assistant United States Attorney Amanda Hector and Pretrial Services Officers Anna Lee in this district and Rana Riner in the Northern District of Georgia (where Mr. Webb currently resides pursuant to the terms of his bail) regarding this application, and they have no objection to the requested modification.

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Mr. Webb's \$10 million personal recognizance bond remains secured by 12 sureties on the bond, and we respectfully submit that the requested modification presents no material easing of Mr. Webb's bail conditions that were previously explained to and consented by each of the 12 sureties in connection with the bail modifications granted by the Court on November 23, 2015. Accordingly, we do not believe that any further consent is required from the sureties with regard to this application.

For the foregoing reasons, and given that there is no government objection to the requested modification, we respectfully request that the Court approve this application. Thank you for your consideration.

Respectfully submitted,

/s/ Edward C. O'Callaghan

Edward C. O'Callaghan

Ernie Gao

cc: United States Attorney's Office, Eastern District of New York (by ECF)  
Pretrial Services Office, Eastern District of New York (by e-mail)  
Pretrial Services Office, Northern District of Georgia (by e-mail)